

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<p>IOENGINE, LLC</p> <p style="text-align: center;">Plaintiff/Counterclaim Defendant,</p> <p style="text-align: center;">v.</p> <p>PAYPAL HOLDINGS, INC.,</p> <p style="text-align: center;">Defendant/Counterclaim Plaintiff.</p>	<p>C.A. No. 18-452-WCB</p> <p>Original Version: March 30, 2022 Public Version: April 8, 2022</p>
<p>INGENICO INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>IOENGINE, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>C.A. No. 18-826-WCB</p> <p>JURY TRIAL DEMANDED</p> <p>Original Version: March 30, 2022 Public Version: April 8, 2022</p>
<p>IOENGINE, LLC,</p> <p style="text-align: center;">Counterclaim Plaintiff,</p> <p style="text-align: center;">v.</p> <p>INGENICO, INC., INGENICO CORP., and INGENICO GROUP S.A.,</p> <p style="text-align: center;">Counterclaim Defendants.</p>	

**IOENGINE, LLC’S WITNESS LIST, ADDITIONAL EXHIBITS LIST, AND
ADDITIONAL DEPOSITION DESIGNATIONS FOR THE APRIL 6, 2022
EVIDENTIARY HEARING ON PAYPAL’S MOTION FOR SPOILIATION SANCTIONS**

Pursuant to the Court’s Order regarding the April 6, 2022, evidentiary hearing on Defendants PayPal Holdings, Inc.’s (“PayPal’s”) Motion for Spoliation Sanctions, 18-452-WCB D.I. 414, IOENGINE, LLC (“IOENGINE”) hereby provides its lists of witnesses, additional

exhibits, and additional deposition designations.

IOENGINE’S WITNESS LIST

IOENGINE will call Mr. Scott McNulty as a live witness and Mrs. Lori McNulty, Mr. Edwin Carlson and Dr. Vijay Madisetti by deposition.

IOENGINE’S LIST OF ADDITIONAL EXHIBITS

In addition to the exhibits the parties submitted in connection with IOENGINE’s Answering Brief in Opposition and Surreply to PayPal’s Motion for Spoliation Sanctions, D.I. 374 and D.I. 383-2, IOENGINE designates the following additional exhibits for use at the April 6, 2022 hearing:

Exhibit No.	Description
HH	IOENGINE014555 - Metadata
II	IOENGINE014556 – Metadata
JJ	IOENGINE014558 - Metadata
KK	IOENGINE014557 - Metadata

Copies of these additional exhibits are being submitted herewith.

IOENGINE’S ADDITIONAL DEPOSITION DESIGNATIONS

IOENGINE provides the following list of additional deposition designations:

Deposition of Vijay Madisetti, November 9, 2016 (IOENGINE011689)
<ul style="list-style-type: none"> ○ 44:10-45:4 ○ 64:5-19 ○ 65:13-20 ○ 72:23-73:14 ○ 73:22-74:13 ○ 89:10-23 ○ 102:10-21

<ul style="list-style-type: none"> ○ 102:25-103:5 ○ 103:20-25 ○ 130:25-131:5
Deposition of Edwin Carlson, August 9, 2021
<ul style="list-style-type: none"> ○ 28:6-21 ○ 29:2-4 ○ 29:10-19 ○ 42:6-14 ○ 42:25-43:6 ○ 43:15-20 ○ 43:25-44:1 ○ 46:12-17 ○ 48:5-25 ○ 49:23-50:6 ○ 50:22-51:2
Deposition of Lori McNulty, October 15, 2021
<ul style="list-style-type: none"> ○ 48:24-49:4 ○ 49:10-50:10 ○ 50:16-21 ○ 51:6-14 ○ 52:3-53:7 ○ 55:2-56:2 ○ 57:2-58:6 ○ 60:5-62:9 ○ 63:14-23 ○ 64:23-65:22

Courtesy copies of the deposition transcript containing these additional deposition designations will be provided via email.

IOENGINE reserves the right to supplement, revise, clarify, withdraw, or otherwise amend these designations and to provide counter-designations and objections to any deposition designations that PayPal provides.

Dated: March 30, 2022

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CERTIFICATE OF SERVICE

I, Eve H. Ormerod, hereby certify that on March 30, 2022, a true and correct copy of the foregoing document was served on the following counsel via email:

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